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BEFORE THE
Federal Communications Commission

WASHINGTON, D.C. 20554

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In the Matter of) PR Docket No. 92-257
)
Amendments of Commission's) Further Notice of
Rules Concerning) Proposed Rulemaking
Maritime Communications)

To: The Commission

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REPLY COMMENTS

OF

MOBILE MARINE RADIO, INC.

Mobile Marine Radio, Inc. ("MMR") respectfully submits its Reply Comments to the Commission regarding the Further Notice of Proposed Rulemaking to review and modernize the regulations governing maritime telecommunications.

With respect to most issues addressed in the Further Notice, MMR's position represents the consensus viewpoint. Without question, MMR's comments were the most detailed and technically/operationally supported in the areas of DSC, automatic interconnection with the public switched telephone network, NB-DP, and permissible communications. In several of those areas, there is less than unanimity among the commenting parties. MMR appreciates the opportunity to further comment on those issues; and MMR limits this Reply

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to DSC implementation, which comments also apply to the related issue of public network interconnection.^{1/}

The Commission's proposal with regard to digital selective calling drew the most interest of any of the issues raised in the rulemaking. In addition to MMR, OWA, Inc., and Ross Engineering support full implementation of DSC as the recognized standard for maritime selective calling, for both private and public correspondence channels.^{2/} Various parties support DSC as the standard signaling protocol for distress and safety purposes, e.g., Coast Guard, Globe Wireless,^{3/} NECODE Electronics, SEA, WJG MarITel, and RTCM.^{4/} Notwithstanding support of DSC for distress and safety functions, several of these parties urge adoption of no standard signaling protocol for operational

^{1/} MMR feels further discussion of channel allocation policy (embraced within the Permissible Communications heading of the Further Notice) is unnecessary at this time. Those parties who supported substantial or total voiding of the commission's loading standards do so only in the most generic terms and without any analysis of context in terms of the VHF channel allotment generally.

^{2/} MMR has no objection to other signaling systems being utilized, provided that DSC is available to both vessel and shore operations, and that an open protocol is utilized.

^{3/} Globe Wireless operates in the MF and HF bands, and its comment should be viewed in that context.

^{4/} The universe of mandatorily equipped vessels under U.S. flag, and therefore subject to the Commission's rules for GMDSS, number in the low 100's.

communications or public correspondence. In recommending such conflicting positions, there is no explanation of any deficiencies or inadequacies of full functionality for DSC, nor refutation of the feasibility of DSC as a universal protocol (as has been demonstrated by various manufacturers), nor any explanation of the economic rationale for utilization of multiple signaling systems.

In the absence of standardizing on DSC for all VHF purposes, and encouraging DSC for MF and HF services, the maritime community will find itself with a large universe of grandfathered transmitters without DSC capability and a variety of add-on units for commercial station calling purposes. The result will be a very slow implementation of DSC by any but mandatorily equipped vessels as calling protocols are dictated locally by the public coast station operators. Such fragmentation neither will enhance safety nor advance maritime communication services.

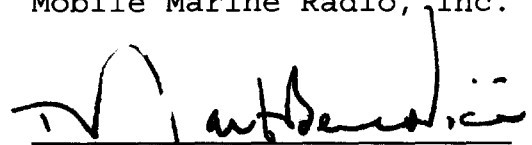
The issue of calling protocols is central to this rulemaking. The Commission's decision on this issue will determine whether the Maritime Services, and particularly the VHF service, progresses in an orderly fashion or whether the service continues to face internal divisions and inefficiencies through the proliferation of alternative signaling systems. Only by seizing the opportunity of the recognized DSC protocol as the standard for VHF maritime

communication service generally can the Commission expect that the service will develop in an orderly manner.

MMR believes that the Commission should convene a conference of interested parties to discuss and attempt to reach a consensus on the issue of DSC applicability. Such a meeting would contribute to a common understanding, and to the Commission's ultimate disposition of this proceeding. MMR urges that such a meeting be broadly bounded, in order that all issues under contention in this proceeding may be addressed.

WHEREFORE, THE PREMISES CONSIDERED, Mobile Marine Radio, Inc. respectfully urges the Commission to recognize digital select calling as standardized protocol for VHF maritime communications for commercial, PSTN interconnection and distress and safety communications.

Respectfully submitted,
Mobile Marine Radio, Inc.



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